

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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HUSSEIN ROBINSON,

Plaintiff,

v.

WILLIAM WOOLEMS, DEALER’S CHOICE  
TRUCKWAY, TRUCKMOVERS.COM, INC.,  
and TRUCKMOVERS HOLDINGS, LLC,

Defendants.

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**NOTICE OF REMOVAL**

**TO THE CLERK OF COURT:**

Pursuant to 28 U.S.C. § 1441, Defendants William Woolems, Dealers’ Choice Truckaway System, Inc. d/b/a “Truckmovers” (improperly pled as “Dealer’s Choice Truckway”) (hereinafter “Dealers’ Choice”), Truckmovers.com, Inc., and Truckmovers Holdings, LLC, by and through their undersigned counsel, Weber Gallagher Simpson Stapleton Fires & Newby, LLP, hereby remove the case captioned Hussein Robinson v. William Woolems, et al. Court of Common Pleas, Philadelphia County, August Term 2021, No. 01909 (the “State Court Action”), from the Court of Common Pleas of Philadelphia County, where it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and as grounds for removal states as follows:

1. Plaintiff initiated the State Court Action by filing a Complaint against Defendants on or about August 20, 2021.

2. Plaintiff's Complaint was the first pleading that contained any information about the claimed damages and the nature of the Plaintiff's claims against Defendants, and the first pleading from which the basis of removal could be determined.

3. In accordance with 28 U.S.C. § 1446(a), true and correct copies of Plaintiff's Complaint, along with all other process, pleadings, and orders served upon Defendants are attached hereto as Exhibit "A." A copy of the docket in the State Court Action is attached as Exhibit "B."

4. Plaintiff alleges Defendant William Woolems negligently changed lanes and caused his motor vehicle to strike Plaintiff's motor vehicle. See Exhibit "A" at ¶ 26, 37.

5. In Count I, Plaintiff alleges that Defendant Woolems' negligence caused him to suffer injuries and damages in excess of \$50,000. Id. at Count I.

6. Plaintiff contends Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC, negligently entrusted the motor vehicle to Defendant Woolems. Id. at ¶39.

7. In Count II, Plaintiff alleges that the negligence of Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC caused him to suffer injuries and damages in excess of \$50,000. Id. at Count II.

8. Plaintiff contends Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC, are liable for Defendant Woolems' alleged negligence pursuant to the doctrine of *respondeat superior*, causing injuries and damages in excess of \$50,000. Id. at Count III.

9. Furthermore, upon information and belief, Plaintiff's claims include a workers compensation lien in an amount in excess of \$80,000.

10. The entire State Court Action is removable to this Court pursuant to 28 U.S.C. § 1441, as this Court has original jurisdiction under 28 U.S.C. § 1332.

**DIVERSITY AS A BASIS FOR JURISDICTION**

11. This Court has original jurisdiction over the State Court Action pursuant to 28 U.S.C. § 1332(a)(1) because there is complete diversity between Plaintiff and Defendants, and the amount in controversy, exclusive of interest and costs, exceeds the sum or value of \$75,000.00.

12. Plaintiff is a citizen of the State of Pennsylvania. Id. ¶ 1.

13. Upon information and belief, Defendant Woolems is a citizen of Virginia.

14. Defendant Dealers' Choice Truckaway System, Inc. is a Kansas corporation, with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

15. Defendant Truckmovers.com, Inc. is a Missouri corporation, with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

16. Defendant Truckmovers Holdings, LLC is a Delaware corporation with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

17. Complete diversity of citizenship exists between Plaintiff and Defendants.

18. Pursuant to 28 U.S.C. § 1441(b), the State Court Action is removable because no party in interest properly joined and served as a Defendant is a citizen of Pennsylvania.

19. Under 28 U.S.C. § 1446(c) "[i]f removal of a civil action is sought on the basis of jurisdiction conferred by section 1332(a), the sum demanded in good faith in the initial pleading shall be deemed to be the amount in controversy, except that – (A) the notice of removal may assert the amount in controversy if the initial pleading seeks – (i) nonmonetary relief; or (ii) a money judgment, but the State practice either does not permit demand for a specific sum or

permits recovery of damages in excess of the amount demanded; and (B) removal of the action is proper on the basis of an amount in controversy asserted under subparagraph (A) if the district court finds, by the preponderance of the evidence, that the amount in controversy exceeds the amount specified in section 1332(a).”

20. Here, Plaintiff’s Complaint demands damages “in an amount in excess of fifty-thousand dollars (\$50,000.00)” in each of the three counts of the Complaint.

21. Furthermore, Plaintiff has alleged a workers compensation lien totaling over \$80,000.

22. Thus, Plaintiff’s request for damages exceeds the \$75,000.00 amount in controversy requirement.

23. Accordingly, the amount in controversy requirement of 28 U.S.C. § 1332 has been satisfied.

#### **OTHER PROCEDURAL MATTERS**

24. Pursuant to 28 U.S.C. § 1446(a), the United States District Court for the Eastern District of Pennsylvania is the appropriate court for filing a Notice of Removal from the Court of Common Pleas of Philadelphia County, Pennsylvania where the State Court Action is pending.

25. Service of the Complaint upon Defendant Woolems was completed on or about August 25, 2021.

26. Service of the Complaint upon Defendant Dealers’ Choice was completed on or about August 27, 2021.

27. Service of the Complaint upon Defendant Truckmovers.com, Inc. was completed on or about August 27, 2021.

28. Service of the Complaint upon Defendant Truckmovers Holdings, LLC was completed on or about August 25, 2021.

29. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

30. Contemporaneous with the filing of this Notice, Defendants have given written notice hereto to Plaintiff, and Defendants will file a true and correct copy of this Notice of Removal with the Court of Common Pleas of Philadelphia County as required by 28 U.S.C. § 1446(d).

**WHEREFORE**, Defendants William Woolems, Dealers' Choice Truckaway System, Inc., Truckmovers.com, Inc., and Truckmovers Holdings, LLC submit this Notice that the State Court Action is removed from the Court of Common Pleas of Philadelphia County to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP**

/s/ Laura A. Seider

June J. Essis, Esquire  
Laura A. Seider, Esquire  
2000 Market Street, Suite 1300  
Philadelphia, PA 19103  
*Attorneys for Defendants*

Date: September 22, 2021

**CERTIFICATE OF SERVICE**

I, Laura A. Seider, Esquire, hereby certify that on this 22<sup>nd</sup> day of September, 2021, I caused to be served a true and correct copy of the foregoing Notice of Removal via E-Mail, upon the following:

Joseph F. Schwartz, Esquire  
Silver & Silver  
42 W. Lancaster Avenue, 3<sup>rd</sup> Floor  
Ardmore, PA 19003  
*Attorney for Plaintiff*

**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP**

/s/ Laura A. Seider

June J. Essis, Esquire  
Laura A. Seider, Esquire  
2000 Market Street, Suite 1300  
Philadelphia, PA 19103  
*Attorneys for Defendants*

# **Exhibit**

## **“A”**

SILVER & SILVER  
By: Joseph F. Schwartz, Esq.  
Identification No.: 87550  
42 W. Lancaster Ave., Third Floor  
Ardmore, PA 19003  
(610) 658 – 1900

JURY TRIAL DEMANDED

Filed and Attested by the  
Office of Judicial Records  
Attorney for Plaintiff 20 AUG 2021 3:38 pm



HUSSEIN ROBINSON  
4347 N. 6<sup>th</sup> Street  
Philadelphia, PA 19140

COURT OF COMMON PLEAS  
OF PHILADELPHIA COUNTY

August Term 2021

v.  
WILLIAM WOOLEMS  
6485 Sandy Ford Road  
Blue Ridge, VA 24064

No.

and  
DEALER'S CHOICE TRUCKWAY  
2310 S. Redwood Ave.  
Independence, MO 64057

and  
TRUCKMOVERS.COM, INC.  
2310 S. Redwood Ave.  
Independence, MO 64057

and  
TRUCKMOVERS HOLDINGS, LLC  
c/o Registered Agent Solutions  
9 E. Lockerman Street, Suite 311  
Dover, DE 19901

and  
JOHN DOE 1  
Owner of Truck Driven by Mr. Woolems

and  
JOHN DOE 2  
Employer of Mr. Woolems

**COMPLAINT IN CIVIL ACTION**  
**2V- MOTOR VEHICLE ACCIDENT**

**NOTICE**

"You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

"YOU SHOULD TAKE THIS PAPER TO YOUR

**AVISO**

"Lo han demandado en la corte. Si usted quiere defenderse de estas demandas expuestas en las siguientes paginas, usted debe tomar una medida dentro de 20 días de la fecha de esta demanda y de la fecha que fue notificado de este aviso, asentando su comparecencia personal por escrito o que un abogado presente al tribunal por escrito sus defensas o objeciones a las demandas expuestas en contra de usted. Se le advierte que si usted falla de hacerlo, el caso puede seguir adelante sin usted y se puede asentar un fallo en el tribunal sin una notificación adicional por cualquier dinero reclamado en la demanda o sin que ninguna otra demanda o descargo sea pedida por el demandante. Usted puede perder dinero o sus propiedades u otros derechos importantes suyos.



LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION  
Lawyer Referral & Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
Telephone (215) 238-1701

"USTED DEBE LLEVAR ESTE DOCUMENTO INMEDIATAMENTE A SU ABOGADO. SI NO TIENE UN ABOGADO VAYA A O LLAME A LA OFICINA ABAJO INDICADA. ESTA OFICINA LE PUEDE PROPORCIONAR CON LA INFORMACIÓN SOBRE COMO CONTRATAR UN ABOGADO.

SI USTED NO TIENE DINERO PARA CONTRATAR A UN ABOGADO, ESTA OFICINA LE PUEDE PROPORCIONAR CON LA INFORMACIÓN SOBRE LAS AGENCIAS QUE LE PUDIERAN OFRECER SERVICIOS LEGALES A PERSONAS A UN HONORARIO REDUCIDO O SIN COBRARLE UNO.

La Asociación de Abogados de Filadelfia  
El Departamento de Remisión a Abogados y  
Servicios de Información  
One Reading Center  
Filadelfia, Pennsylvania 19107  
Teléfono: (215) 238-1701

SILVER & SILVER  
 By: Joseph F. Schwartz, Esq.  
 Identification No.: 87550  
 42 W. Lancaster Ave., Third Floor  
 Ardmore, PA 19003  
 (610) 658 – 1900

JURY TRIAL DEMANDED

Attorney for Plaintiff

HUSSEIN ROBINSON  
 4347 N. 6<sup>th</sup> Street  
 Philadelphia, PA 19140  
 v.  
 WILLIAM WOOLEMS  
 6485 Sandy Ford Road  
 Blue Ridge, VA 24064  
 and  
 DEALER'S CHOICE TRUCKWAY  
 2310 S. Redwood Ave.  
 Independence, MO 64057  
 and  
 TRUCKMOVERS.COM, INC.  
 2310 S. Redwood Ave.  
 Independence, MO 64057  
 and  
 TRUCKMOVERS HOLDINGS, LLC  
 c/o Registered Agent Solutions  
 9 E. Lockerman Street, Suite 311  
 Dover, DE 19901  
 and  
 JOHN DOE 1  
 Owner of Truck Driven by Mr. Woolems  
 and  
 JOHN DOE 2  
 Employer of Mr. Woolems

COURT OF COMMON PLEAS  
 OF PHILADELPHIA COUNTY

August Term 2021

No.

**COMPLAINT IN CIVIL ACTION  
 2V- MOTOR VEHICLE ACCIDENT**

Plaintiff, by his undersigned counsel brings this action against the above captioned Defendants, and in support thereof avers as follows:

1. Plaintiff, Hussein Robinson, is an adult individual residing at the above captioned address.
2. Defendant William Woolems (hereinafter "Defendant Woolems") is an adult individual residing at the above listed address.

3. Defendant Dealer's Choice Truckway (hereinafter "Defendant DCT") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

4. Upon information and belief, Defendant DCT regularly conducts business in Philadelphia County.

5. Defendant Truckmovers.Com, Inc. (hereinafter "Defendant TCI") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

6. Upon information and belief, Defendant TCI regularly conducts business in Philadelphia County.

7. Defendant Truckmovers Holdings, LLC (hereinafter "Defendant THL") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

8. Upon information and belief, Defendant THL regularly conducts business in Philadelphia County.

9. Defendant John Doe 1 is the owner of the truck being operated by Defendant Woolems.

10. Upon information and belief, Defendant John Doe 1 regularly conducts business in Philadelphia County.

11. Defendant John Doe 2 is the entity that employed Defendant Woolems at the time of the accident.

12. Upon information and belief, Defendant John Doe 2 regularly conducts business in Philadelphia County.

13. This litigation arises out of a motor vehicle accident that took place on or about October 21, 2019 on I-81 North near Shippensburg, PA.

14. At all times material hereto, Plaintiff was the operator of a white International Tractor Trailer (hereinafter "Plaintiff's Vehicle").

15. At all times material hereto, Defendant Woolems was the operator of an Orange Volo Tractor Trailer (hereinafter "Defendants' Vehicle").

16. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant DCT.

17. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant TCI.

18. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant THL.

19. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant John Doe 1.

20. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant DCT.

21. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant TCI.

22. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant THL.

23. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant John Doe 2.

24. At all times material hereto, Defendant Woolems was acting within the course and scope of his employment.

25. The scope and employment of Defendant Woolems employment included permission to utilize Defendants' Vehicle.

26. At the aforementioned time and place, Defendant Woolems improperly changed lanes, causing Defendants' Vehicle to collide with Plaintiff's vehicle.

27. As a result of this collision, Plaintiff has suffered personal injuries, including, but not limited to, cervical radiculopathy, lumbar radiculopathy, lumbar disc injuries, and injuries to his neck, midback and low back.

28. At all times material hereto, Plaintiff acted in a reasonable and prudent manner, was in no way negligent, and in no manner caused or contributed to the happening of this collision.

29. The accident and Plaintiff's injuries were directly and proximately caused by the negligence of the Defendants and were due in no manner to any act or omission on the part of the Plaintiff.

30. At all times material hereto, Plaintiff did not assume the risk of his injuries.

31. As a direct and proximate result of the tortious conduct of Defendants, Plaintiff has suffered in the past, and in the future will continue to suffer great pain, agony, mental anguish, and a diminution of his ability to enjoy life and life's pleasures.

32. As a further result of tortious conduct of Defendants, Plaintiff has been and will in the future be compelled to expend large sums of money for medical treatments and diagnostics, in an effort to permanently and thoroughly cure himself of the injuries and/or sufferings brought about as a result of the accident.

33. As a direct and proximate result of the tortious conduct of Defendants Plaintiff was unable to work due to his injuries and incurred significant wage loss.

34. As a direct and proximate result of the tortious conduct of Defendants a workers' compensation lien in excess of \$80,000 is being asserted for indemnity and medical payments made due to the injuries Plaintiff sustained in this matter.

35. As a direct and proximate result of the tortious conduct of Defendants, Plaintiff has incurred in the past and will continue to incur in the future, other financial expenses or losses, including lost wages and diminished earning capacity, which do or will exceed the amount which he may otherwise be entitled to recover.

**COUNT I – NEGLIGENCE**  
**Hussein Robinson v. William Woolems**

36. The preceding paragraphs are incorporated by reference as if set forth fully below.

37. The aforementioned collision was the direct and proximate result of the negligent operation of the motor vehicle by Defendant Woolems in that he:

- a. Failed to apply his brakes in time to avoid said collision;
- b. Negligently applied his brakes to avoid said collision;
- c. Operated the vehicle in careless disregard for the safety of persons or property in violation of 75 Pa. Cons. Stat. § 3714;
- d. Failed to steer the vehicle in a manner so as to avoid said collision;
- e. Permitted and allowed Defendants' vehicle to strike and collide with Plaintiff's vehicle;
- f. Failed to keep a reasonable lookout for other vehicles;
- g. Failed to adequately observe Plaintiff's vehicle;
- h. Although he saw or should have seen Plaintiff's vehicle, failed to slacken speed, turn vehicle, or take any other evasive action in an attempt to avoid the collision;
- i. Failed to have his vehicle under proper and adequate control;
- j. Improperly and unsafely changed lanes in violation of 75 Pa. Cons. Stat. § 3309.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendant William Woolems in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

**COUNT II – NEGLIGENCE**

**Hussein Robinson v. Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2**

38. The preceding paragraphs are incorporated by reference as if set forth fully below.

39. The aforementioned collision was the direct and proximate result of the negligent action by Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in that they:

- a. Negligently entrusted the Volvo Tractor Trailer to Defendant Wollems for use when it knew, or with reasonable exercise of due care, should have known, that the operator was not capable of operating the motor vehicle properly;
- b. Negligently entrusted the Volvo Tractor Trailer to Defendant Wollems for use when it knew, or in the exercise of reasonable care, should have known the operator was going to operate the vehicle in an negligent manner;
- c. Negligently entrusted the Volvo Tractor Trailer to Defendant Wollems for use without regard for the safety of other drivers, specifically, Plaintiff; and
- d. Negligently employed Defendant Wollems with the responsibility of operating a motor vehicle.

40. As a direct and proximate result of the negligence of Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2, Plaintiff sustained personal injuries and damages as described herein.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendants Dealer's Choice Truckway; Truckmovers.Com,

Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

**COUNT III – NEGLIGENCE**

**Hussein Robinson v. Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2**

41. The preceding paragraphs are incorporated by reference as if set forth fully below.

42. The aforementioned collision was the legal responsibility of Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 pursuant to *respondeat superior* in that their employee, servant, or agent, Defendant Wollems, was in the scope and course of his employment at the time of the accident and acted negligently and carelessly to cause this accident.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

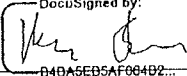
Dated: 8/20/21

SILVER & SILVER  
*Joseph F. Schwartz Esq.*  
Joseph F. Schwartz, Esquire  
Attorney for Plaintiff



**VERIFICATION**

I, Hussein Robinson, hereby verify that the statements made in the foregoing Complaint are and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to penalties of 18 Pa. C.S.A. Sec. 4904, relating to unsworn falsification to authorities.

DocuSigned by:  
  
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Hussein Robinson

Date: 8/17/2021

# **Exhibit**

# **“B”**

9/21/21, 12:13 PM

Civil Docket Report


 No Items in Cart **Logout**

Civil Docket Report

A \$5 Convenience fee will be added to the transaction at checkout.

**Case Description**

**Case ID:** 210801909  
**Case Caption:** ROBINSON VS WOOLEMS ETAL  
**Filing Date:** Friday , August 20th, 2021  
**Court:** MAJOR JURY-STANDARD  
**Location:** City Hall  
**Jury:** JURY  
**Case Type:** MOTOR VEHICLE ACCIDENT  
**Status:** WAITING TO LIST CASE MGMT CONF

**Related Cases***No related cases were found.***Case Event Schedule***No case events were found.***Case motions***No case motions were found.***Case Parties**

Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	SCHWARTZ, JOSEPH F
<b>Address:</b>	42 W. LANCASTER AVE. THIRD FLOOR ARDMORE PA 19003 (610)658-1900 jschwartz@silverandsilver.com		<b>Aliases:</b>	<i>none</i>
2	1		PLAINTIFF	ROBINSON, HUSSEIN
<b>Address:</b>	4347 N. 6TH STREET PHILADELPHIA PA 19140		<b>Aliases:</b>	<i>none</i>
3			DEFENDANT	WOOLEMS, WILLIAM
<b>Address:</b>	6485 SANDY FORD ROAD		<b>Aliases:</b>	<i>none</i>

9/21/21, 12:13 PM

Civil Docket Report

	BLUE RIDGE VA 24064			
4			DEFENDANT	DEALER'S CHOICE TRUCKWAY
<b>Address:</b>	2310 S. REDWOOD AVE. INDEPENDENCE MO 64057	<b>Aliases:</b>	none	
5			DEFENDANT	TRUCKMOVERS.COM INC
<b>Address:</b>	2310 S. REDWOOD AVE. INDEPENDENCE MO 64057	<b>Aliases:</b>	none	
6			DEFENDANT	TRUCKMOVERS HOLDINGS LLC CO REGISTERED AGENT SOLUTIONS
<b>Address:</b>	9 E. LOCKERMAN STREET SUITE 311 DOVER DE 19901	<b>Aliases:</b>	none	
7			DEFENDANT	DOE 1, JOHN
<b>Address:</b>	NO ADDRESS NO CITY PA No Zip	<b>Aliases:</b>	none	
8			DEFENDANT	DOE 2, JOHN
<b>Address:</b>	NO ADDRESS NO CITY PA No Zip	<b>Aliases:</b>	none	
9			TEAM LEADER	ANDERS, DANIEL J
<b>Address:</b>	529 CITY HALL PHILADELPHIA PA 19107	<b>Aliases:</b>	none	

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
20-AUG-2021 03:38 PM	ACTIVE CASE			20-AUG-2021 04:13 PM
<b>Docket Entry:</b>	E-Filing Number: 2108039930			



9/21/21, 12:13 PM

Civil Docket Report

20-AUG-2021 03:38 PM	COMMENCEMENT CIVIL ACTION JURY	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Final Cover</a> <div>  Click HERE to purchase all documents related to this one docket entry </div>			
<b>Docket Entry:</b>	none.			
20-AUG-2021 03:38 PM	COMPLAINT FILED NOTICE GIVEN	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">MVA complaint H Robinson.pdf</a> <div>  Click HERE to purchase all documents related to this one docket entry </div>			
<b>Docket Entry:</b>	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
20-AUG-2021 03:38 PM	JURY TRIAL PERFECTED	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
<b>Docket Entry:</b>	12 JURORS REQUESTED.			
20-AUG-2021 03:38 PM	WAITING TO LIST CASE MGMT CONF	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
<b>Docket Entry:</b>	none.			
01-SEP-2021 10:28 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:29 AM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Aff of Service - Woolems.pdf</a> <div>  Click HERE to purchase all documents related to this one docket entry </div>			
<b>Docket Entry:</b>	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON WILLIAM WOOLEMS BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 08/25/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)			
01-SEP-2021 10:30 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:31 AM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Aff of Service - Dealers Choice.pdf</a> <div>  Click HERE to purchase all documents related to this one docket entry </div>			
<b>Docket</b>	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON DEALER'S			

9/21/21, 12:13 PM.

Civil Docket Report

<b>Entry:</b> CHOICE TRUCKWAY BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 08/27/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)				
01-SEP-2021 10:33 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:34 AM
<b>Documents:</b> <a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Aff of Service - Truckmovers.pdf</a> <div>  <a href="#">Click HERE to purchase all documents related to this one docket entry</a> </div>				
<b>Docket Entry:</b> AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON TRUCKMOVERS.COM INC BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 08/27/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)				
01-SEP-2021 10:35 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:36 AM
<b>Documents:</b> <a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Aff of Service - Truckmovers Holdings.pdf</a> <div>  <a href="#">Click HERE to purchase all documents related to this one docket entry</a> </div>				
<b>Docket Entry:</b> AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON TRUCKMOVERS HOLDINGS LLC CO REGISTERED AGENT SOLUTIONS BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 08/25/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)				

[▶ Case Description](#)[▶ Related Cases](#)[▶ Event Schedule](#)[▶ Case Parties](#)[▶ Docket Entries](#)

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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Hussein Robinson

(b) County of Residence of First Listed Plaintiff Philadelphia, PA  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Joseph F. Schwartz, Esq. 42 W. Lancaster Ave., Third  
Floor, Ardmore, PA 19003

**DEFENDANTS**

William Woolems, et al

County of Residence of First Listed Defendant Bedford  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Laura A. Seider, Weber Gallagher, 2000 Market St., Suite  
1300, Philadelphia, PA 19103

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. Section 1332(a)(1)  
Brief description of cause:  
Motor Vehicle Accident

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** CHECK YES only if demanded in complaint:  
**JURY DEMAND:** ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

9/22/2021

/s/ Laura A. Seider, Esquire

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_



**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44****Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.



## APPENDIX I

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Hussein Robinson	:	CIVIL ACTION
	:	
v.	:	
William Woolems, Dealer's Choice	:	
Truckway, Truckmovers.com, Inc.,	:	NO.
Truckmovers Holdings, LLC		

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See §1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2 ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

September 22, 2021

**Date**

215-972-7920

**Telephone***/s/ Laura A. Seider***Attorney-at-law**

215-564-7699

**FAX Number**

Defendants

**Attorney for**

lseider@wglaw.com

**E-Mail Address**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**DESIGNATION FORM**

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: 4347 N. 6th Street, Philadelphia, PA 19140

Address of Defendant: 2310 S. Redwood Avenue, Independence, MO 64057

Place of Accident, Incident or Transaction: Interstate I-81 North, near Shippensburg, PA.

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: September 22, 2021 Laura A. Seider 308971  
 \_\_\_\_\_ Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☒ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, \_\_\_\_\_, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_ Sign here if applicable  
 \_\_\_\_\_ Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.